

Bay Mills Indian Community
Brimley, Michigan 49715
**Grand Traverse Band
of Ottawa & Chippewa Indians**
Suttons Bay, Michigan 49682
Hannahville Indian Community
Wilson, Michigan 49896
Saginaw Chippewa Indian Tribe
Mt. Pleasant, Michigan 48858
**Little Traverse Bay
Bands of Odawa Indians**
Harbor Springs, Michigan 49740
**Nottawaseppi Band of
Huron Potawatomi**
Fulton, Michigan 49502



Keweenaw Bay Indian Community
Baraga, Michigan 49908
**Lac Vieux Desert Band
of Lake Superior Chippewa
Tribal Government**
Watersmeet, Michigan 49969
**Sault Ste. Marie
Tribe of Chippewa Indians**
Sault Ste. Marie, Michigan 49783
**Pokagon Band of
Potawatomi Indians**
Dowagiac, Michigan 49047
**Match-E-Be-Nash-She
(Gun Lake Tribe)**
Dorr, Michigan 49323

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June 7, 2010

Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way, Ste. 7
Lansing, MI 48911

RE: MPSC Case No. U-16077; In the matter of the request of Holland Board of Public Works for approval of its Electric Generation Alternatives Analysis

Dear Executive Secretary Kunkle,

On behalf of the Inter-Tribal Council of Michigan Environmental Services Department (ESD), please accept the following comments on the Electric Generation Alternatives Analysis for the proposed Holland Board of Public Works (HBPW) James De Young coal-fired power plant expansion, as required for the HBPW air permit application (PTI 25-07).

The proposed HBPW expansion is of significant concern to the ESD. The proposed expansion is located within 100 miles of five different Tribal Reservations, including Match-E-Be-Nash-She-Wish Band of Potawatomi, Pokagon Band of Potawatomi Indians, Nottawaseppi Huron Band of the Potawatomi, Saginaw Chippewa Indian Tribe, and Little River Band of Ottawa Indians. The air emissions from the proposed expansion may impact the local and regional air, water, and forest resources, on which Tribal communities depend for economic and socio-cultural wellbeing. Several Tribes have members residing within the HBPW service area, who rely on HBPW for energy and are subject to HBPW rates. The environmental and economic impacts of the proposed expansion will be shared among local and distant Tribal communities in Michigan.

The Electric Generation Alternatives Analysis for HBPW does not demonstrate the need for the proposed expansion. The Alternatives Analysis does, however, include incomplete analyses of prudent and feasible alternatives to the expansion, including energy efficiency, load management, biomass, wind, landfill gas, and hydro technologies. These alternative technologies are feasible options that may better protect local and regional human and environmental health and economic wellbeing. These technologies already fit HBPW's business plan, albeit at a smaller scale than there is potential for. The ESD references the report from Schlissel Technical Consulting, Inc., cited and provided by the Sierra Club and other Citizen Groups on the Michigan Public Service Commission e-docket.

Two recently proposed coal-fired power plants in Michigan have been canceled and tabled due to the existing adequate energy supply in Michigan and available energy efficiency and renewable energy options. The MDNRE determined on May 21, 2010, that the Wolverine Power Supply Cooperative had not demonstrated the need for the proposed Wolverine Clean Energy Venture in Rogers City, MI, and denied Wolverine's PTI. After receiving an approved PTI, Consumers Energy voluntarily tabled their plans to expand the Karn Weadock plant in Essexville, MI, based on a lack of customer demand and the costs of constructing a new coal plant.

The use of coal as fuel for the expansion is not the preferred alternative among the available energy efficiency, load management, and renewable and fossil fuel-derived energy opportunities in southeast Michigan. The air emissions from burning coal include criteria, hazardous, and bioaccumulating pollutants, in addition to immense quantities of greenhouse gases. The proposed expansion may negatively impact the local and regional air quality, freshwater ecosystems and fisheries, and contribute to climate change for generations to come. In addition to the high rates of air emissions, coal has the burden of complying with increasing regulatory demands. HBPW and its customers will be responsible for paying the costs of complying with air quality regulations, including upcoming regulations for greenhouse gas emissions, and coal ash storage regulations, in addition to the price of coal itself subject to extraction and transportation costs. These costs were inadequately characterized in the Alternatives Assessment.

HBPW use of municipal solid waste and biomass as fuel inputs is a step away from coal and toward a more economically and environmentally responsible direction. The use of biomass should be wisely coordinated, however; HBPW has commissioned a study on the availability of forest products from within a 100 mile radius. That 100 mile radius touches the lands of the five Tribes mentioned above and enters the southern boundary of the 1836 Treaty of Washington ceded territory. As mentioned above, Tribal community members rely on forest resources for economic and cultural wellbeing. Unsustainable use and depletion of local forest resources by HBPW would impinge upon Tribal community economic and cultural uses, as well as increase the costs paid by HBPW customers.

The Electric Generation Alternatives Analysis for HBPW fails to demonstrate the need for the proposed James De Young unit expansion. Prudent and feasible alternatives to the expansion exist, which are more protective of the local and regional economy and environment and are currently available to HBPW in meeting its customer demand. The Inter-Tribal Council of Michigan ESD requests that the MPSC recommend the MDNRE deny HBPW's air permit application (PTI 25-07).

Thank you for the opportunity to comment on this important proposal.

Robin Clark
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